Keeping your Risk Management Program in Compliance

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General Requirements

- Management system not developed and implemented
- Recommend an organizational chart to reflect duties in the management system by position
- Most importantly, implement your Prevention Program and Emergency Response Plan

Risk Management Plan Submittal

- Initial submittal before exceeding a regulated substance threshold
- Public Document does not need all technical documents, but should describe them and include summaries of PHA, Program Elements,
- Update as needed

Program 1, 2 and 3

- Based on potential risk
- Program 1 no offsite consequences
- Program 3 sites have higher potential risks than Program 2.

Hazard Assessment

- Prevention Program 1-one worst case scenario
- Prevention Program 2 and 3-one worst case and one alternative scenario
- Must use RMP Offsite consequence Analysis guidance or industry recognized modeling program
- List any sensitive receptors and estimated total population.
- Update as needed and at least every five years

Prevention Program 2

- Safety information
 - Include MSDS, maximum inventory, safe operating parameters, equipment specs and codes and standards used
 - Ensure the process is designed compliant to regulations and industry/engineering standards
 - Update as needed

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Hazard Review

- Identify all hazards
- List safeguards in place to minimize hazards
- Identify steps used to detect or monitor releases
- Update at least every five years or after a major process change

Operating Procedures

- Must be in writing
- Shall cover the following
 - 1. Initial startup
 - 2. Normal and temporary operations
 - Emergency shutdown and operations
 Normal Shutdown

 - 5. Start up procedures after a normal or emergency shutdown
 - Consequences of system deviations and how to afford these
 - 7. Equipment inspections

Training Program

- All employees working with a covered process must be trained in operating procedures
- Refresher training at least every three
- Train in any new or updated procedures prior to start up

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Maintenance

- Implement procedures for ongoing mechanical integrity
- Train employees in covered process maintenance
- Maintenance contractors must train their employees in proper procedures
- Perform inspections on process equipment
- Document maintenance completed

Compliance Audits

- Required every three years
- Must be conducted by at least one person knowledgeable in the process
- Must complete a written audit report
- Must address audit findings promptly
- Retain the most two recent audit reports
- Checklists are available from USEPA

Incident Investigations

- Needed for all real or reasonably expected catastrophic releases
- Recommended for all real or threatened releases
- Must begin within 48 hours
- Written summary is required. Keep for five vears
- If catastrophic, add to five year accident history within six months

Prevention Program 3

- Process safety information
 - 1. Material Safety Data sheets
 - 2. Information on the technology of the process
 - 3. Information on the equipment in the process
 - 4. Document that the equipment complies with good engineering practices
 - Document that the equipment is designed, operated, maintained, and inspected in a safe manner.

Process Hazard Analysis

- Appropriate PHA methodology
- Address all reasonable hazards
- Performed by a team experience with the process
- Address the PHA's finding
- Updated and revalidated at least every five years

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 - 5. Start up procedures after a normal or emergency shutdown
 - 6. Consequences of system deviations and how to afford these
 - 7. Equipment inspections
- Annual certification the procedures are current and accurate

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Training

- All employees working with a covered process must be trained in operating procedures
- Refresher training at least every three years
- Train in any new or updated procedures prior to start up
- Document training conducted and that employees understand the training

Mechanical Integrity

- Look at all components of the covered process
- Need written procedures
- Employee training on maintenance
- Regular inspections and testing
- Correct Deficiencies

Management of Change

- Not for replacement in kind
- Major process changes
- Document with a written form
- Train employees prior to the change
- Modify your operating procedures as needed

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Pre-Startup Review

- For new or modified stationary sources
- Pre-startup Safety Review shall confirm
- 1. Design specifications have been met
- 2. Safety, operating, maintenance, and emergency procedures are in place
- 3. PHA has been conducted and recommendations implemented
- 4. All employee training has been conducted

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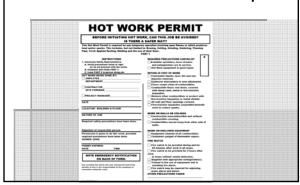
Employee Participation

- Must have a written plan for employee participation
- Employees and their reps must be consulted for the Process Hazard Analysis
- Employees and their reps must have access to all information required by the CalARP regulations.

Hot Work Permit

- Must issue a hot work permit for all hot work done by a covered process
- The permit must document that all fire prevention and protection requirements have been met
- Produced by the stationary source or contractor

Hot Work Permit Example



Contractors

- Owners or operators responsibilities
 - 1. Obtain information on the contractors safety
 - 2. Inform the contractor of the hazards of the covered process
 - 3. Explain the emergency response plan
 - 4. Develop safe practices for the entry, presense, and exit of contractors
 - 5. Evaluate the contractor's safety performance

Contractors

- Contractor's responsibility
 - 1. Assure employees are trained in safety
 - 2. Assure employees are trained in the potential hazard of a covered process
 - 3. Document all training
 - 4. Assure all employees follow safety procedures
 - 5. Advise the owner/operator of any unique hazards his work may cause

Emergency Response Program

- Required by responding agencies
- Non responding agencies must:
 - 1. Be included in the community emergency response plan/area plan
 - 2. Coordinate with local emergency responders

Emergency Response Program

- Must include the following:
 - 1. Procedures for coordinating with emergency responders
 - 2. First aid for exposures to a regulated substance
 - 3. Procedures for how to respond to an emergency release

Emergency Response Program

- Contain procedures for emergency response equipment
- Training for all responding employees
- Procedures to review and update the emergency response plan as needed

This presentation is only one of many compliance tools

- EPA guidance documents
 - http://www.epa.gov/emergencies/content/rm p/index.htm
- OES guidance documents
 - http://www.oes.ca.gov/Operational/OESHom e.nsf/978596171691962788256b350061870 e/452A4B2AF244158788256CFE00778375 ?OpenDocument
- San Diego County guidance documents

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CalARP is not easy Any Questions?

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